

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appl. No.:	10/693,679	§	Confirmation No.:	8660
Applicant:	Stephanie Marel	§		
Filed:	10/23/2003	§		
TC/A.U.:	2455	§		
Examiner:	Asad M. Nawaz	§		
Title:	Context Filter	§		
Docket No.:	500111540-2	§		
	(HPC.0815US)	§		

Mail Stop Appeal Brief-Patents

Commissioner for Patents

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REPLY BRIEF

Sir:

The following sets forth Appellant's Reply to the Examiner's Answer dated March 5, 2010.

A. REPLY TO EXAMINER'S ANSWER REGARDING THE REJECTION OF CLAIMS 1, 4, 5, 10, 12-14

Independent claim 1 recites a method of matching structured descriptions, comprising:

- detecting a context reflecting an environment in which the matching is to occur;
- matching the detected context to a concept list appropriate to the detected context;
- using the concept list to transform the structured descriptions into reduced structured descriptions;
- matching the reduced structured descriptions; and
- providing an output representing the matching between the structured descriptions.

The Appeal Brief set forth detailed reasons regarding why Chen fails to disclose the subject matter of claim 1. The Appeal Brief noted that it appeared that the Examiner was equating a query as disclosed in Chen with a structured description as recited in claim 1. As

noted in the Appeal Brief, modifying the search criteria of a query based upon context, as taught by Chen, is completely different from transforming structured descriptions (note plural sense of the structured descriptions) into reduced structured descriptions that are then matched, as recited in claim 1.

In response to the foregoing arguments, the Examiner stated that a query contains multiple words. Examiner's Answer at 6. The Examiner argued that Chen discloses that each word in a query can be transformed, citing as an example to column 9, lines 47-52, of Chen. *Id.* at 6-7. It appears that the Examiner has read the "using" clause of claim 1 in isolation, without regard to how this clause of claim 1 relates to other clauses of claim 1. Claim 1 further recites matching the **reduced structured descriptions**, and providing an output representing the **matching between the structured descriptions**. The reduced structured descriptions in the "matching" and "providing" clauses refer to the reduced structured descriptions that were transformed from the structured descriptions using the concept list, as claimed.

If the words of a query in Chen are considered to be the "structured descriptions" of claim 1, then it is clear that Chen provides absolutely no hint whatsoever of matching the words of a query to each other. In fact, matching one portion of a query with another portion of a query makes no technical sense. Moreover, a person of ordinary skill in the art would also understand that matching queries would also make no sense.

In view of the foregoing, it is clear that Chen fails to disclose the "using" element of claim 1, in combination with the "matching" and "providing" elements.

The Appeal Brief also argued that Chen fails to disclose matching the detected context to a concept list appropriate to the detected context, where the detected context reflects an environment in which the matching is to occur. In response, the Examiner cited the following

passages of Chen: column 5, lines 19-24; column 8, lines 1-13. Examiner's Answer at 7. The cited column 5 passage of Chen states that each topic may have an associated set of keywords and phrases, and that the determination of whether a document is relevant to a particular topic can be based upon a conventional weighting or thresholding procedure based upon the occurrences of these keywords and phrases in the document. Identifying a topic relevant to a document, as noted in column 5 of Chen, is different from detecting a context reflecting an environment in which matching of structured descriptions is to occur, and matching the detected context to a concept list appropriate to the detected context.

With respect to the column 8 passage of Chen, the Examiner argued that this passage of Chen teaches that user queries are processed by the query/result-services module 390 to determine a search topic. Examiner's Answer at 7. Determining a search topic for a user query, does not constitute detecting a context reflecting an environment in which the matching is to occur, and matching the detected context to a concept list appropriate to the detected context.

In view of the foregoing and in view of the arguments presented in the Appeal Brief, the rejection of the foregoing claims is clearly erroneous.

B. CONCLUSION

The remaining arguments made in the Examiner's Answer are rebutted in the Appeal Brief and/or in the foregoing remarks.

Reversal of the final rejection is respectfully requested.

Respectfully submitted,

Date: May 4, 2010

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